

N00102.AR.003160
NSY PORTSMOUTH
5090.3a

LETTER AND THE MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS
REGARDING THE SAMPLING AND ANALYSIS PLAN OPERABLE UNIT 8 (OU 8) REMEDIAL
INVESTIGATION RED LINE STRIKOUT VERSION NSY PORTSMOUTH ME
02/12/2015
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

February 12, 2015

ATTN: L.L. Cole, BLDG Z-144, 1st FLOOR
COMMANDING OFFICER
NAVFAC MIDLANT
9324 VIRGINIA AVE
NORFOLK, VA 23511-3095

re: Sampling and Analysis Plan, OU8 Remedial Investigation, Red-line strikeout version,
Portsmouth NSY, Kittery, Maine, Feb. 2015.

Dear Linda,

The Maine Department of Environmental Protection has completed its review of the subject document. We have the following comments.

1. 11.4 Analytic Approach. "There is no decision rule for the EPH data collected, as the data is being collected for informational purposes and no decisions for remedial action will be made based on the results." MEDEP disagrees that the EPH data are for informational purposes only. MEDEP's EPH criteria are risk-based and therefore an exceedance of these criteria in soil indicates unacceptable risk. Should EPH values in soil at OU8 exceed MEDEP Tier II values for Outdoor Commercial Worker and Excavation Construction Worker further discussion will be required. It may be necessary for the Navy to remove soil based on exceedances of EPH criteria.
2. Section 10.4.3. Please explain why the Navy removed the fuel oil tanks as potential sources.
3. Thank you for providing the logs from the 1998 SI. However, our June 11, 2014 comment was referring to the boring logs associated with work at Buildings 92 and 174 that are mentioned in worksheet 13. Those logs need to be in the final SAP, or at least in the report for the investigation (logs and data were provided to MEDEP via email 11/6/2013 for the 2011 test pits, however the other 2010 boring logs referenced in the SAP are not included). Please include them as an appendix as they will contribute to the characterization of the site for the remedial investigation.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826

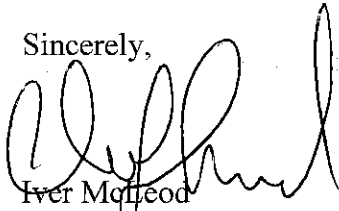
BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Iver McLeod', written over the printed name.

Iver McLeod

Project Manager

Bureau of Remediation and Waste Management

pc: Chris Evans, MEDEP

Matt Audet, USEPA

Lisa Joy, US Navy

Matt Thyng, US Navy

Debbie Cohen, TtNUS

Paul Dombrowski, Resolution

PNSY RAB

Doug Grout, NH Fish and Game

File